

amendments to the claims presented hereby. In particular, the Applicant has amended claim 1, and claims 7-18 are newly presented hereby.

Initially, the Applicant respectfully submits that the Examiner has not identified any disclosure, teaching, or suggestion in the record that would motivate one of ordinary skill in the art to combine the Gusdorf and Carpinelli '316 references as suggested in the Office Action. The Gusdorf reference depicts a fairly conventional support structure that is adapted to hook over the top of a door or be fastened to a front face of the door.

The Applicant respectfully submits that the Gusdorf reference does not provide any teaching that would motivate one of ordinary skill in the art to use a magnetic portion as recited in the claims. Initially, nothing in the Gusdorf reference suggests that the door is made from a material other than wood or even that the material from which the door is made has any bearing on the design of the support structure.

To the contrary, the methods of supporting the Gusdorf support structure to the door wood work equally well regardless of the material from which the door is made. The suspension hooks disclosed in the Gusdorf reference extend not only over the top of the door, but down along a rear face of the door. These suspension hooks thus would prevent the type of movement that would otherwise be inhibited by a magnetic portion as used in the claimed invention. Clearly, when screw-type fasteners are used to secure the support structure to the face of a door, the fasteners obviate the need to use additional fasteners such as magnets.

In either case, the additional use of magnets would be superfluous, and the Applicant respectfully submits that one of ordinary skill in the art would not be motivated to modify the teachings of Gusdorf with a magnetic fastener such as is taught by Carpinelli '316. The Applicant respectfully submits that the Examiner appears to have used impermissible hindsight gained from reading the Applicant's disclosure in combining the Gusdorf and Carpinelli '316 references. The Applicant thus respectfully requests withdrawal of the rejection to the claims under 35 USC § 103(a) based on the combination of the Gusdorf and Carpinelli '316 references.

Even if these references are properly combinable, however, the Applicant respectfully submits that this combination does not disclose, teach, or suggest the

systems and methods recited in the claims. As amended, claim 1 specifies that both the rear and front portions of the support system extend over a portion of the top and side surfaces, respectively, of the metal structure. These front and rear portions do not hook around three side surfaces. In both the Gusdorf and Carpinelli '316 references, the hooks extend around at least three (Gusdorf) and as many as four (Carpinelli '316) sides of the structure.

The Applicant respectfully submits that the amendments to claim 1 distinguish the invention recited therein over the teachings of the Gusdorf and Carpinelli '316 references, taken alone or in combination. The Applicant thus respectfully submits that the amendments to claim 1 render moot the rejection thereof under 35 USC § 103(a), and withdrawal of the rejection of claim 1 based on the combination of Gusdorf and Carpinelli '316 is respectfully requested.

Turning now to newly presented claims 7-18, claim 7 is an independent claim reciting the combination of a primary product display unit and a secondary product display unit. Claim 7 recites a combination that is clearly not disclosed, taught, or suggested by either of the Gusdorf and Carpinelli '316 references, and allowance of claim 7, and claims 8-12 which depend therefrom, is respectfully requested.

Claim 13 recites a method of combining a primary product display unit with a secondary product display unit. Claim 13 recites a method that is also clearly not disclosed, taught, or suggested by either of the Gusdorf and Carpinelli '316 references. The Applicant thus respectfully submits that claim 13, and claims 14-18 which depend therefrom, are in condition for allowance, and such allowance is respectfully requested.

Submitted herewith is a document (entitled Exhibit A - Listing of All Claims and Amendments (05-25-2006)) containing a listing of the claims as currently presented. The Listing attached herewith contains the text of each pending claim, along with any amendments made hereby (illustrated using strikethrough and underlining) and the status of each pending claim.

Given the foregoing, the Applicant respectfully submits that currently pending claims 1-18 are in condition for allowance, and such allowance is respectfully requested. If there is any matter which could be expedited by consultation with the

Applicant's attorney, such would be welcome. The Applicant's attorney can normally be reached at the telephone number below.

Signed at Bellingham, County of Whatcom, State of Washington this 25th day of May, 2006.

Respectfully submitted,

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CERTIFICATE OF MAILING

37 C.F.R. §1.8

I hereby certify that this paper (along with any paper referred to as being attached or enclosed) is being deposited with the United States Postal Service as first class mail in an envelope addressed to Mail Stop Non-Fee Amendment, Commissioner for Patents, P.O. Box 1450, Alexandria, VA 22313-1450, on the date shown below.

Signature: Susie Hubka

Print Name: Susie Hubka

Date: May 25, 2006